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PORT OF PORTLAND

February 7, 2006

Mr. Tom Gainer
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201-4987

**Subject: Terminal 5 Upland Facility
Transmittal of Contaminated Area and Media Management Plan
ECSI No. 1686**

Dear Tom:

Enclosed please find two copies of the Contaminated Area and Media Management Plan (CAAMMP) for the Terminal 5 Upland Facility (Facility) in Portland, Oregon. The CAAMMP was revised to address Oregon Department of Environmental Quality (DEQ) comments provided to the Port of Portland (Port) in a letter dated January 17, 2006. To assist in your review of the revised CAAMMP, we have listed below each of the DEQ comments and how it was addressed in the plan:

Section 1.0 *The general soil management plan for the rest of the T5 site outside the Restricted Area should be referenced.*

The first paragraph in Section 1.0 (Introduction) has been revised to include the following statement:

"The restrictions defined in this CAAMMP apply only in the Restricted Area. Management of Terminal 5 environmental media outside the Restricted Area remains covered by existing leases and applicable laws and regulations."

Section 1.2 *In the groundwater bullet, replace the word "safe" with "acceptable."*

The word "safe" was replaced by "acceptable."

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Sections 1.2 and 4.0 *The plan addresses potential groundwater extraction due to construction dewatering activities. Please clarify if there are general restrictions on groundwater use by tenants. For example, could a tenant install and use a groundwater supply well for industrial or irrigation purposes that could influence migration of "restricted" Blue Lagoon groundwater?*

A tenant's right of use of groundwater are discussed and negotiated as a part of the lease agreement and, therefore, may be different for each lease agreement and/or tenant. Therefore, to address the DEQ comment, above, the following language was added to the CAAMMP (Section 4.0):

"To the extent the Port or one of its tenants uses groundwater outside (or inside) the Restricted Area for whatever purpose other than related to construction dewatering, the Port and/or tenant will do so in a manner that does not contribute to or exacerbate any pre-existing hazardous substance releases in the former Blue Lagoon Area."

Section 3.1.2 *A minimum stockpile sampling rate of one sample per 100 cubic yards of stockpiled soil should be specified.*

Section 3.1.2 of the CAAMMP has been revised to include a minimum sampling rate of one sample per 100 cubic yards of stockpiled soil.

Section 3.2 *Please specify the maximum duration that excavated restricted soil can be stockpiled on site (e.g., two months). Restricted soil should not be indefinitely stockpiled on site.*

The CAAMMP (Section 3.2) was revised to include a maximum duration of three months that soil can be stockpiled on site.

Section 3.3 *The second bullet addresses soil below industrial PRGs but above background concentrations. Such soil can be used on site as long as it doesn't result in groundwater or storm water concentrations that exceed applicable standards. In this particular case, DEQ recommends that the excavated soil not be placed in contact with storm water.*

The following language was added to the CAAMMP (Section 3.3) to address this comment:

"The soil may be re-used at the Facility provided that it doesn't result in storm water concentrations that exceed applicable standards (e.g., it can not be placed in erosional areas near unprotected stormwater inlets)."

Section 3.4 *Please specify that reports to DEQ should reference ECSI Site #1686.*

Sections 4.3 and 4.3 have been revised to require that reports to be submitted to the DEQ reference ECSI Site #1686.

Table 1 *Please provide a reference source for background soil concentrations listed in this table.*


Washington Department of Ecology *Natural Background Soil Metals Concentrations in Washington State* (October 1994); [Clark County values] were used for background concentrations, with the exception of barium. There are no values for barium provided in the Ecology document, so a site specific background for barium generated by PTI in 1995 was used. These references are listed in Table 1.

We trust that the above revisions adequately address the DEQ comments in the January 17, 2006 letter. With the submittal of the final CAAMMP, all outstanding issues identified by the DEQ have been resolved and a No Further Action determination for the Facility is supported.

Mr. Tom Gainer
February 7, 2006
Page 3

Please call me at (503) 944-7323 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Nicole Anderson". The signature is fluid and cursive, with a long, sweeping underline.

Nicole Anderson
Environmental Program Manager

Enclosure

c: David Ashton, Port
David Breen, Port
Sebastian Degens
Loralie Sinnen, Port
Anne Summers, Port
Bob Teeter, Port
Amanda Spencer, Ash Creek Associates